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August 6, 2004

Mr. Terry Tamminen, Secretary
California Environmental Protection Agency
1001 I Street
PO Box 2815
Sacramento, California 95814

RE: July 2004 Draft California Environmental Protection Agency Intra-Agency
Environmental Justice Strategy

Dear Secretary Tamminen:

On behalf of its 30 member counties, the Regional Council of Rural Counties (RCRC) has appreciated the opportunity to share our “rural” perspective on “environmental justice.” We are pleased that three of our four recommendations were incorporated into the July 2004 Draft California Environmental Protection Agency Intra-Agency Environmental Justice Strategy. We believe, with these changes, that consultation and outreach to local government and locally elected officials is adequately addressed.

We remain concerned, however, that our recommendation to require consideration of any disproportionate economic and/or social impacts to rural counties is not included in this revision. Note that this issue extends beyond just rural counties. RCRC requests you consider amending “Objective A” in support of Goal #2 as follows:

“When developing, adopting, and implementing environmental laws, regulations, and policies, identify and address environmental justice issues, including any disproportional economic impact, to any segment of the population.”

A comprehensive assessment of the degree to which State programs financially impact rural areas differently from urban areas needs to be addressed. This is especially true when dealing with publicly funded government programs. The financial analyses performed on many new regulations and policies are often presented as a statewide average cost and benefit. This fails to recognize the disproportionately higher costs of implementation in certain low income areas of the state because of lower population densities, longer travel distances, and lack of infrastructure.

RCRC looks forward to your positive consideration. Please call me at (916) 447-4806 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Pitto". The signature is fluid and cursive, with the first name "Mary" and the last name "Pitto" clearly distinguishable.

Mary Pitto
Regulatory Program Director

cc: Alan C. Lloyd, Ph. D., Chair ARB
Linda Moulton-Patterson, Chair, CIWMB
Arthur G. Baggett, Jr., Chair, SWRCB
James Branham, Undersecretary, Cal/EPA
Tam Doduc, Deputy Secretary, Cal/EPA
Celeste Cantu, Executive Director, SWMCB
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Regional Council of Rural Counties Board of Directors